

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
ATHENS DIVISION**

GREAT NORTHERN	)	
INSURANCE COMPANY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
ROB MARETT INC., AND	)	
ROBERT M. MARETT, JR.,	)	
Individually,	)	
	)	
Defendants.	)	
<hr/>	)	
ROB MARETT, INC.,	)	CIVIL ACTION
	)	FILE NO. 3:07-CV-28 (CDL)
Defendant/Third	)	
Party Plaintiff	)	
	)	
v.	)	
	)	
MORAN FRAMING CO.,	)	
INC., MICHAEL MORAN	)	
WOODMAN INSULATION	)	
CO., INC., and	)	
AIR-TIGHT INSULATION, INC.	)	
	)	
Third-Party Defendants.	)	
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**THIRD-PARTY DEFENDANT WOODMAN INSULATION CO., INC.'S  
MOTION FOR EXTENSION OF TIME TO SUPPLEMENT DISCLOSURE  
OF EXPERT REPORTS**

COMES NOW Third-party Defendant Woodman Insulation Co., Inc.  
("Woodman") , by and through its undersigned counsel of record, and respectfully

moves this Court for an extension of time within which to supplement the disclosure of the reports of its expert witnesses. In support of this motion, Woodman respectfully shows this Court as follows:

1.

The original proposed scheduling order filed by the parties on July 30, 2007, provided that discovery ended on December 28, 2007, plaintiff was required to disclose its expert witnesses within 90 days of Woodman's answer, and defendants were required to disclose their expert witnesses within 120 days of Woodman's answer.

2.

Plaintiff filed its expert disclosures on October 16, 2007. Woodman filed its expert disclosures on October 26, 2007. Defendant Marett filed its expert disclosures on November 5, 2007.

3.

After Marett filed a third-party complaint against third-party defendant Air-Tight Insulation, Inc. on December 12, 2007, the parties filed a joint motion for an extension of discovery on December 28, 2007, asking for an extension of 90 days, or until March 27, 2008, to complete discovery. The Court granted the motion on December 31, 2007.

4.

The parties filed a second proposed scheduling order on March 28, 2008, providing that discovery ends on May 30, 2008, dispositive motions must be filed by June 30, 2008, and that defendants must provide expert reports by April 18, 2008.

5.

In a contemporaneously-filed pleading, Woodman is now amending its previously filed expert disclosures to provide affidavits from its experts, Kevin Cunningham and Dan Arnold, summarizing their expert opinions in this case.

6.

Woodman's experts intend to supplement their affidavits with more detailed reports. However, they are unable to complete the detailed reports until May 23, 2008 due to prior professional commitments requiring extensive travel, including work by Mr. Arnold on the recent sugar refinery explosion in Savannah.

7.

In addition, Woodman's experts have been unable to complete their detailed reports by April 18, 2008 despite their best efforts since they were only asked to complete their investigations and produce a report after the Court denied Woodman's motion for summary judgment on March 27, 2008.

8.

The other parties will not be prejudiced should the Court grant the instant motion since the identities and qualifications of its experts were disclosed by Woodman on October 26, 2007, and since the substance of its expert's opinions is set forth in the contemporaneously-filed amendment to its previously filed expert disclosures.

9.

This extension is sought in good faith and is not intended to delay the resolution of this matter.

WHEREFORE, Woodman Insulation respectfully requests that this Court grant Woodman an extension of time until May 23, 2008, to supplement the disclosure of the reports of its expert witnesses. A proposed Order is submitted herewith.

Respectfully submitted, this 18th day of April, 2008.

s/ Ruth M. Pawlak  
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*Counsel for Third-Party Defendant  
Woodman Insulation Co., Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 18, 2008, I served the within and foregoing **THIRD-PARTY DEFENDANT WOODMAN INSULATION CO., INC.'S MOTION FOR EXTENSION OF TIME TO SUPPLEMENT DISCLOSURE OF EXPERT REPORTS** with the Clerk of Court using CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

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